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8 Attorneys for Defendants
9 Transamerica Premier Life Insurance Company
f/k/a Monumental Life Insurance Company
and Transamerica Financial Life Insurance Company

10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 DONNA LAMB, individually,

14 Plaintiff,

15 vs.

16 TRANSAMERICA PREMIER LIFE
INSURANCE COMPANY;
17 TRANSAMERICA FINANCIAL LIFE
INSURANCE COMPANY;
18 MONUMENTAL LIFE INSURANCE
COMPANY; WELLS FARGO BANK,
N.A.; and DOES 1 through 100,
19 Inclusive,

20 Defendants.

Case No. 2:18-cv-03255-FMO-MRW

Honorable Fernando M. Olguin

**STIPULATION FOR EXTENSION OF
TIME FOR DEFENDANTS
TRANSAMERICA PREMIER LIFE
INSURANCE COMPANY F/K/A
MONUMENTAL LIFE INSURANCE
COMPANY AND TRANSAMERICA
FINANCIAL LIFE INSURANCE
COMPANY TO RESPOND TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT (BY NOT MORE
THAN 30 DAYS)**

21 [L.R. 8-3]

22 Complaint served: April 5, 2018
23 Current response date: April 26, 2018
24 New response date: May 25, 2018

25 Complaint Filed: March 13, 2018

STIPULATION

2 Pursuant to Rule 8-3 of the Local Rules of Practice for the United States
3 District Court for the Central District of California, Plaintiff Donna Lamb
4 (“Plaintiff”) and Defendants Transamerica Premier Life Insurance Company,
5 formerly known as Monumental Life Insurance Company, and Transamerica
6 Financial Life Insurance Company (collectively, “Defendants”), by and through
7 their respective counsel of record, hereby stipulate to extend the time within which
8 Defendants may answer or otherwise respond to the First Amended Complaint
9 (“FAC”) filed by Plaintiff on April 4, 2018 in the Superior Court of California,
10 County of Los Angeles.

11 Defendants' agents for service of process were personally served with a copy
12 of the Summons and Complaint on March 19, 2018. Prior to the initial response
13 pleading deadline and prior to removal to this Court, Plaintiff filed the FAC in state
14 court on April 4, 2018. Defendants' agents for service of process were personally
15 served with a copy of the Summons and FAC on April 5, 2018.

16 Defendants' timely removed the above-entitled action to this Court on April
17 18, 2018. Based upon service of the FAC on April 5, 2018, and pursuant to Rule
18 81(c) of the Federal Rules of Civil Procedure, Defendants' response to the FAC is
19 due April 26, 2018.

20 Defendants' counsel has requested to extend the initial responsive pleading
21 deadline by not more than 30 days so as to allow defense counsel time to gather and
22 review the relevant documents and to prepare the responsive pleading(s).
23 Defendants have not requested any prior continuances of the initial responsive
24 pleading deadline.

25 The parties, by and through their respective counsel of record, hereby
26 stipulate that Defendants' shall have additional time from the initial response date in
27 which to answer or otherwise respond to the FAC, such that a responsive pleading
28 filed on or before May 25, 2018 shall be deemed timely.

1 Pursuant to this Court's Civil Local Rule 8-3, because the requested extension
2 is not more than 30 days, this stipulation "need not be approved by the judge," but
3 shall be filed with the Clerk.

4

5 DATED: April 23, 2018

HINSHAW & CULBERTSON LLP

6

7 By: /s/ Chakameh Ganji

8 MISTY A. MURRAY
9 VIVIAN I. ORLANDO
10 CHAKAMEH GANJI

11 Attorneys for Defendants Transamerica
12 Premier Life Insurance Company f/k/a
13 Monumental Life Insurance Company
14 and Transamerica Financial Life
15 Insurance Company

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DATED: April 23, 2018

GRASSINI, WRINKLE & JOHNSON

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29 By: /s/ Lars C. Johnson

30 LAWRENCE P. GRASSINI
31 LARS C. JOHNSON
32 BRIAN HONG
33 Attorneys for Plaintiff
34 Donna Lamb

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